

**United States District Court  
Southern District of Texas  
FILED**

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
McALLEN DIVISION**

SEP 06 2023

**Nathan Ochsner, Clerk**

# UNITED STATES OF AMERICA

v.

**Criminal No. M-23-1248**

**MARIO REYES**  
**KEVIN GARZA**  
**JORGE LUIS VELASQUEZ**  
**JULIO CESAR RODRIGUEZ-AZUA**  
**CARLOS MIGUEL PEREZ-GONZALEZ**

SEALED INDICTMENT

## **THE GRAND JURY CHARGES:**

Count One

From on or about July 11, 2023 and continuing through on or about August 18, 2023 in the  
Southern District of Texas, Defendants

and  
**MARIO REYES**

did knowingly combine, conspire, and agree with each other and with other persons known and unknown to the grand jury to commit offenses against the United States in violation of Title 18, United States Code, Section 1956(a)(2)(A), to wit: to transport, transmit, transfer, or attempts to transport, transmit, or transfer a monetary instrument or funds from a place outside the United States to or through a place inside the United States with the intent to promote the carrying on of specified unlawful activity, namely, the smuggling of goods contrary to Title 18, United States Code, Section 554.

In violation of Title 18, United States Code, Section 1956(h):

## Count Two

### Count Three

From on or about February 7, 2023 through at least August 18, 2023, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

KEVIN GARZA

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: approximately 11,480 rounds of .50 caliber ammunition, 11,220 rounds of 7.62x39mm caliber ammunition, 4,000 rounds of 5.56mm caliber ammunition; and 3,000 rounds of .38 super caliber ammunition, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States

Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

**Count Four**

On or about August 8, 2023, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**JORGE LUIS VELASQUEZ**

did fraudulently and knowingly export and send from the United States or attempt to export and send from the United States to the United Mexican States, any merchandise, article, or object, to wit: approximately 1,500 rounds of .50 caliber ammunition, contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

**Count Five**

From on or about July 11, 2023 through at least August 18, 2023, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**MARIO REYES**

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: approximately 6,200 rounds of .50 caliber ammunition, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

**Count Six**

From on or about September 8, 2021 through at least August 18, 2023, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**JULIO CESAR RODRIGUEZ-AZUA**

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: approximately 440,000 rounds of 7.62x39 caliber ammunition, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

**Count Seven**

From on or about September 8, 2021 through at least August 18, 2023, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**CARLOS MIGUEL PEREZ-GONZALEZ**

did fraudulently and knowingly receive, conceal, buy, sell, or in any manner facilitate the transportation, concealment, or sale of any merchandise, article, or object, to wit: approximately 200,000 rounds of 7.62x39 caliber ammunition, prior to exportation, knowing the same to be intended for exportation contrary to any law or regulation of the United States, namely, without a license or written approval from the United States Department of Commerce, as required by Title 50, United States Code, Sections 4819 and Title 15, Code of Federal Regulations, Sections 730-774.

In violation of Title 18, United States Code, Sections 554(a) and 2.

**Count Eight**

On or about August 17, 2023, in the Southern District of Texas and within the jurisdiction of the Court, defendant,

**CARLOS MIGUEL PEREZ-GONZALEZ**

knowingly being an alien who was illegally and unlawfully in the United States, did knowingly possess in and affecting interstate and foreign commerce, a firearm, namely, one Glock, Model 21, .45 caliber handgun.

In violation of Title 18, United States Code, Sections 922(g)(5)(A) and 924(a)(8).

**NOTICE OF FORFEITURE**  
**19 U.S.C. § 1595a(d) and 28 U.S.C. § 2461**

Pursuant to 19 U.S.C. § 1595a(d), 18 U.S.C. 924(d)(1), and 28 U.S.C. § 2461 the United States gives notice to defendants,

[REDACTED]  
MARIO REYES  
KEVIN GARZA  
JORGE LUIS VELASQUEZ  
JULIO CESAR RODRIGUEZ-AZUA  
and  
CARLOS MIGUEL PEREZ-GONZALEZ

that upon conviction of a violation of Title 18 U.S.C. §554, as charged in this Indictment, all merchandise exported or sent from the United States or attempted to be exported or sent from the United States contrary to law, or the proceeds or value thereof, and property used to facilitate the exporting or sending of such merchandise, the attempted exporting or sending of such merchandise, or the receipt, purchase, transportation, concealment, or sale of such merchandise prior to exportation shall be forfeited to the United States and includes, but is not limited to the following:

approximately 1,500 rounds of .50 caliber ammunition seized on August 8, 2023;  
approximately 10,000 rounds of 7.62 x 39 caliber ammunition seized on August 17, 2023;  
approximately 34 rounds of .45 caliber ammunition seized on August 17, 2023;  
approximately 1,800 rounds of .50 caliber ammunition seized on August 18, 2023;  
approximately 15,021 rounds of 7.62 x 39 caliber ammunition seized on August 18, 2023;  
approximately 5,000 rounds of 7.62 x 39 caliber ammunition seized on August 30, 2023 and  
approximately 150 rounds of .50 caliber ammunition seized on August 30, 2023

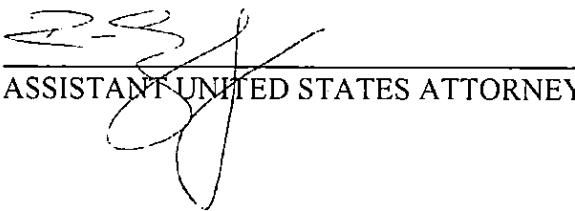
and that upon conviction of a violation of Title 18 U.S.C. § 922(g)(5)(A), all firearms and ammunition involved in said violation are subject to forfeiture, including, but not limited to, the following:

a Glock, Model 21, .45 caliber handgun

A TRUE BILL

FOREPERSON

ALAMDAR S. HAMDANI  
UNITED STATES ATTORNEY

  
ASSISTANT UNITED STATES ATTORNEY

TRUE COPY I CERTIFY  
ATTEST: September 07, 2023  
NATHAN OCHSNER, Clerk of Court

By: s/ Yesenia Ibarra  
Deputy Clerk